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Attorneys for Defendant UNITED STATES
 DEPARTMENT OF LABOR

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE
 REPORTING and WILL EVANS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
 LABOR,

Defendant.

) Case No. 19-cv-05603-SK

) **STIPULATED PROPOSED BRIEFING**
) **SCHEDULE; ORDER AS MODIFIED**

Pursuant to this Court's Order dated December 3, 2019, Dkt. No. 16, Plaintiffs The Center For Investigative Reporting and Will Evans (collectively referred to as "CIR") and Defendant United States Department of Labor ("DOL") respectfully submit this Stipulated Proposed Briefing Schedule.

Following a meet and confer process, the following issue remains in dispute: whether Defendant has appropriately asserted legal exemptions with respect to certain documents that were withheld from production in whole or in part. The parties believe that this issue is suitable for submission to the Court through cross-motions for summary judgment motion. The parties stipulate to and jointly propose the following schedule:

1. Last day for Defendant to file Motion for Summary Judgment: February 4, 2020, not to exceed 25 pages of text.
2. Last day for Plaintiffs to file Opposition and Cross Motion for Summary Judgment: March 3, 2020, not to exceed 25 pages of text.
3. Last Day for Defendant to file Reply and Cross-Opposition: March 17, 2020, not to exceed 20 pages of text.
4. Last Day for Plaintiff to file Cross-Reply (if necessary): March 31, 2020, not to exceed 20 pages of text.
5. Hearing: April 20, 2020 at 1:30 p.m.

DATED: December 11, 2019

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/ Pamela T. Johann
PAMELA T. JOHANN
Assistant United States Attorney

Attorneys for Defendant

DATED: December 11, 2019

THE CENTER FOR INVESTIGATIVE
REPORTING

/s/ D. Victoria Baranetsky
D. VICTORIA BARANETSKY

Attorneys for Plaintiffs

ATTESTATION

I, Pamela T. Johann, hereby attest that I have obtained the concurrence in the filing of this document from D. Victoria Baranetsky.

/s/ Pamela T. Johann
PAMELA T. JOHANN

ORDER

Pursuant to the parties' stipulation, the Court adopts the requested briefing schedule. The hearing will be held on April 27, 2020.

IT IS SO ORDERED.

Dated: December 11, 2019



HON. SALLIE KIM
United States Magistrate Judge